

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEVIN MOORE,

CASE NO: 7:16-cv-04773-KMK

Plaintiff,

vs.

ANTHONY J. ANNUCCI, etc.,
Et al,

Defendants.

DEFENDANT, CARSON MORRIS', ANSWERS TO PLAINTIFF'S
VERIFIED AMENDED COMPLAINT

COMES NOW, the Defendant, CARSON MORRIS, (hereinafter referred to as "MORRIS") by and through his undersigned attorney, and files this his Answer to Plaintiff, KEVIN MOORE'S (hereinafter referred to as "MOORE" or "Plaintiff") Verified Amended Complaint, and states the following:

ANSWER

1. Defendant, MORRIS, admits the allegations contained in paragraph 1 of Plaintiff's Verified Amended Complaint.
2. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 2 of Plaintiff's Verified Amended Complaint.
3. Defendant, MORRIS, denies the allegations contained in paragraph 3 of Plaintiff's Verified Amended Complaint.
4. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 4 of Plaintiff's Verified Amended Complaint.

5. Defendant, MORRIS, admits the allegations contained in paragraph 5 of Plaintiff's Verified Amended Complaint.

6. Defendant, MORRIS, admits the allegations contained in paragraph 6 of Plaintiff's Verified Amended Complaint.

7. Defendant, MORRIS, admits the allegations contained in paragraph 7 of Plaintiff's Verified Amended Complaint.

8. Defendant, MORRIS, admits the allegations contained in paragraph 8 of Plaintiff's Verified Amended Complaint.

9. Defendant, MORRIS, admits the allegations contained in paragraph 9 of Plaintiff's Verified Amended Complaint.

10. Defendant, MORRIS, admits the allegations contained in paragraph 10 of Plaintiff's Verified Amended Complaint.

11. Defendant, MORRIS, admits the allegations contained in paragraph 11 of Plaintiff's Verified Amended Complaint.

12. Defendant, MORRIS, admits the allegations contained in paragraph 12 of Plaintiff's Verified Amended Complaint.

13. Defendant, MORRIS, admits the allegations contained in paragraph 13 of Plaintiff's Verified Amended Complaint.

14. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 14 of Plaintiff's Verified Amended Complaint.

15. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 15 of Plaintiff's Verified Amended Complaint.

16. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 16 of Plaintiff's Verified Amended Complaint.

17. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 17 of Plaintiff's Verified Amended Complaint.

18. Defendant, MORRIS, denies the allegations as to the Defendant, CARSON MORRIS, contained in paragraph 18 of Plaintiff's Verified Amended Complaint.

19. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 19 of Plaintiff's Verified Amended Complaint.

20. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 20 of Plaintiff's Verified Amended Complaint.

21. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 21 of Plaintiff's Verified Amended Complaint.

22. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 22 of Plaintiff's Verified Amended Complaint.

23. Defendant, MORRIS, denies the allegations contained in paragraph 23 of Plaintiff's Verified Amended Complaint.

24. Defendant, MORRIS, denies the allegations contained in paragraph 24 of Plaintiff's Verified Amended Complaint.

25. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 25 of Plaintiff's Verified Amended Complaint.

26. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 26 of Plaintiff's Verified Amended Complaint.

27. Defendant, MORRIS, admits the allegations contained in paragraph 27 of Plaintiff's Verified Amended Complaint.

28. Defendant, MORRIS, admits the allegations contained in paragraph 28 of Plaintiff's Verified Amended Complaint.

29. Defendant, MORRIS, denies the allegations contained in paragraph 29 of Plaintiff's Verified Amended Complaint.

30. Defendant, MORRIS, denies the allegations contained in paragraph 30 of Plaintiff's Verified Amended Complaint.

31. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 31 of Plaintiff's Verified Amended Complaint.

32. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 32 of Plaintiff's Verified Amended Complaint.

33. Defendant, MORRIS, denies the allegations contained in paragraph 33 of Plaintiff's Verified Amended Complaint.

34. Defendant, MORRIS, denies the allegations contained in paragraph 34 of Plaintiff's Verified Amended Complaint.

35. Defendant, MORRIS, denies the allegations contained in paragraph 35 of Plaintiff's Verified Amended Complaint.

36. Defendant, MORRIS, denies the allegations contained in paragraph 36 of Plaintiff's Verified Amended Complaint.

37. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 37 of Plaintiff's Verified Amended Complaint.

38. Defendant, MORRIS, denies the allegations contained in paragraph 38 of Plaintiff's Verified Amended Complaint.

39. Defendant, MORRIS, denies the allegations contained in paragraph 39 of Plaintiff's Verified Amended Complaint.

40. Defendant, MORRIS, denies the allegations contained in paragraph 40 of Plaintiff's Verified Amended Complaint.

41. Defendant, MORRIS, admits the allegations contained in paragraph 41 of Plaintiff's Verified Amended Complaint.

42. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 42 of Plaintiff's Verified Amended Complaint.

43. Defendant, MORRIS, admits the allegations contained in paragraph 43 of Plaintiff's Verified Amended Complaint.

44. Defendant, MORRIS, denies the allegations contained in paragraph 44 of Plaintiff's Verified Amended Complaint.

45. Defendant, MORRIS, denies the allegations contained in paragraph 45 of Plaintiff's Verified Amended Complaint.

46. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 46 of Plaintiff's Verified Amended Complaint.

47. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 47 of Plaintiff's Verified Amended Complaint.

48. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 48 of Plaintiff's Verified Amended Complaint.

49. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 49 of Plaintiff's Verified Amended Complaint.

50. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 50 of Plaintiff's Verified Amended Complaint.

51. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 51 of Plaintiff's Verified Amended Complaint.

52. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 52 of Plaintiff's Verified Amended Complaint.

53. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 53 of Plaintiff's Verified Amended Complaint.

54. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 54 of Plaintiff's Verified Amended Complaint.

55. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 55 of Plaintiff's Verified Amended Complaint.

56. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 56 of Plaintiff's Verified Amended Complaint.

57. Defendant, MORRIS, denies the allegations contained in paragraph 57 of Plaintiff's Verified Amended Complaint.

58. Defendant, MORRIS, denies the allegations contained in paragraph 58 of Plaintiff's Verified Amended Complaint.

59. Defendant, MORRIS, denies the allegations contained in paragraph 59 of Plaintiff's Verified Amended Complaint.

60. Defendant, MORRIS, denies the allegations contained in paragraph 60 of Plaintiff's Verified Amended Complaint.

61. Defendant, MORRIS, denies the allegations contained in paragraph 61 of Plaintiff's Verified Amended Complaint.

62. Defendant, MORRIS, denies the allegations contained in paragraph 62 of Plaintiff's Verified Amended Complaint.

63. Defendant, MORRIS, denies the allegations contained in paragraph 63 of Plaintiff's Verified Amended Complaint.

64. Defendant, MORRIS, denies the allegations contained in paragraph 64 of Plaintiff's Verified Amended Complaint.

65. Defendant, MORRIS, denies the allegations contained in paragraph 65 of Plaintiff's Verified Amended Complaint.

66. Defendant, MORRIS, denies the allegations contained in paragraph 66 of Plaintiff's Verified Amended Complaint.

67. Defendant, MORRIS, denies the allegations contained in paragraph 67 of Plaintiff's Verified Amended Complaint.

68. Defendant, MORRIS, denies the allegations contained in paragraph 68 of Plaintiff's Verified Amended Complaint.

69. Defendant, MORRIS, denies the allegations contained in paragraph 69 of Plaintiff's Verified Amended Complaint.

70. Defendant, MORRIS, denies the allegations contained in paragraph 70 of Plaintiff's Verified Amended Complaint.

71. Defendant, MORRIS, denies the allegations contained in paragraph 71 of Plaintiff's Verified Amended Complaint.

72. Defendant, MORRIS, denies the allegations contained in paragraph 72 of Plaintiff's Verified Amended Complaint.

73. Defendant, MORRIS, denies the allegations contained in paragraph 73 of Plaintiff's Verified Amended Complaint.

74. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 74 of Plaintiff's Verified Amended Complaint.

75. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 75 of Plaintiff's Verified Amended Complaint.

76. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 76 of Plaintiff's Verified Amended Complaint.

77. Defendant, MORRIS, denies the allegations contained in paragraph 77 of Plaintiff's Verified Amended Complaint.

78. Defendant, MORRIS, is without knowledge of the allegations as to Defendant, CARSON MORRIS, contained in paragraph 78 of Plaintiff's Verified Amended Complaint.

79. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 79 of Plaintiff's Verified Amended Complaint.

80. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 80 of Plaintiff's Verified Amended Complaint.

81. Defendant, MORRIS, denies the allegations contained in paragraph 81 of Plaintiff's Verified Amended Complaint.

82. Defendant, MORRIS, denies the allegations contained in paragraph 82 of Plaintiff's Verified Amended Complaint.

83. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 83 of Plaintiff's Verified Amended Complaint.

84. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 84 of Plaintiff's Verified Amended Complaint.

85. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 85 of Plaintiff's Verified Amended Complaint.

86. Defendant, MORRIS, denies the allegations contained in paragraph 86 of Plaintiff's Verified Amended Complaint.

87. Defendant, MORRIS, denies the allegations contained in paragraph 87 of Plaintiff's Verified Amended Complaint.

88. Defendant, MORRIS, denies the allegations contained in paragraph 88 of Plaintiff's Verified Amended Complaint.

89. Defendant, MORRIS, denies the allegations contained in paragraph 89 of Plaintiff's Verified Amended Complaint.

90. Defendant, MORRIS, denies the allegations contained in paragraph 90 of Plaintiff's Verified Amended Complaint.

91. Defendant, MORRIS, denies the allegations contained in paragraph 91 of Plaintiff's Verified Amended Complaint.

92. Defendant, MORRIS, repeats and realleges all of his answers to paragraphs 1 through 91 of Plaintiff's Verified Amended Complaint.

93. Defendant, MORRIS, denies the allegations contained in paragraph 93 of Plaintiff's Verified Amended Complaint.

94. Defendant, MORRIS, denies the allegations contained in paragraph 94 of Plaintiff's Verified Amended Complaint.

95. Defendant, MORRIS, denies the allegations contained in paragraph 95 of Plaintiff's Verified Amended Complaint.

96. Defendant, MORRIS, denies the allegations contained in paragraph 96 of Plaintiff's Verified Amended Complaint.

97. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 97 of Plaintiff's Verified Amended Complaint.

98. Defendant, MORRIS, denies the allegations contained in paragraph 98 of Plaintiff's Verified Amended Complaint.

99. Defendant, MORRIS, repeats and realleges all of his answers to paragraphs 1 through 98 of Plaintiff's Verified Amended Complaint.

100. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 100 of Plaintiff's Verified Amended Complaint.

101. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 101 of Plaintiff's Verified Amended Complaint.

102. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 102 of Plaintiff's Verified Amended Complaint.

103. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 103 of Plaintiff's Verified Amended Complaint.

104. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 104 of Plaintiff's Verified Amended Complaint.

105. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 105 of Plaintiff's Verified Amended Complaint.

106. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 106 of Plaintiff's Verified Amended Complaint.

107. Defendant, MORRIS, denies the allegations contained in paragraph 107 of Plaintiff's Verified Amended Complaint.

108. Defendant, MORRIS, repeats and realleges all of his answers to paragraphs 1 through 107 of Plaintiff's Verified Amended Complaint.

109. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 109 of Plaintiff's Verified Amended Complaint.

110. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 110 of Plaintiff's Verified Amended Complaint.

111. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 111 of Plaintiff's Verified Amended Complaint.

112. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 112 of Plaintiff's Verified Amended Complaint.

113. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 113 of Plaintiff's Verified Amended Complaint.

114. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 114 of Plaintiff's Verified Amended Complaint.

115. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 115 of Plaintiff's Verified Amended Complaint.

116. Defendant, MORRIS, denies the allegations contained in paragraph 116 of Plaintiff's Verified Amended Complaint.

117. Defendant, MORRIS, repeats and realleges all of his answers to paragraphs 1 through 116 of Plaintiff's Verified Amended Complaint.

118. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 118 of Plaintiff's Verified Amended Complaint.

119. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 119 of Plaintiff's Verified Amended Complaint.

120. Defendant, MORRIS, denies the allegations contained in paragraph 120 of Plaintiff's Verified Amended Complaint.

121. Defendant, MORRIS, denies the allegations contained in paragraph 121 of Plaintiff's Verified Amended Complaint.

122. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 122 of Plaintiff's Verified Amended Complaint.

123. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 123 of Plaintiff's Verified Amended Complaint.

124. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 124 of Plaintiff's Verified Amended Complaint.

125. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 125 of Plaintiff's Verified Amended Complaint.

126. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 126 of Plaintiff's Verified Amended Complaint.

127. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 127 of Plaintiff's Verified Amended Complaint.

128. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 128 of Plaintiff's Verified Amended Complaint.

129. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 129 of Plaintiff's Verified Amended Complaint.

130. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 130 of Plaintiff's Verified Amended Complaint.

131. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 131 of Plaintiff's Verified Amended Complaint.

132. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 132 of Plaintiff's Verified Amended Complaint.

133. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 133 of Plaintiff's Verified Amended Complaint.

134. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 134 of Plaintiff's Verified Amended Complaint.

135. Defendant, MORRIS, is without knowledge as to the allegations contained in paragraph 135 of Plaintiff's Verified Amended Complaint.

136. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 136 of Plaintiff's Verified Amended Complaint.

137. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 137 of Plaintiff's Verified Amended Complaint.

138. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 138 of Plaintiff's Verified Amended Complaint.

139. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 139 of Plaintiff's Verified Amended Complaint.

134. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 134 of Plaintiff's Verified Amended Complaint.

135. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 135 of Plaintiff's Verified Amended Complaint.

136. Defendant, MORRIS, repeats and realleges all of his answers to paragraphs 1 through 135 of Plaintiff's Verified Amended Complaint.

137. Defendant, MORRIS, denies the allegations contained in paragraph 137 of Plaintiff's Verified Amended Complaint.

138. Defendant, MORRIS, denies the allegations contained in paragraph 138 of Plaintiff's Verified Amended Complaint.

139. Defendant, MORRIS, denies the allegations contained in paragraph 139 of Plaintiff's Verified Amended Complaint.

140. Defendant, MORRIS, denies the allegations contained in paragraph 140 of Plaintiff's Verified Amended Complaint.

141. Defendant, MORRIS, denies the allegations contained in paragraph 141 of Plaintiff's Verified Amended Complaint.

142. Defendant, MORRIS, denies the allegations as to Defendant, CARSON MORRIS, contained in paragraph 142 of Plaintiff's Verified Amended Complaint.

143. Defendant, MORRIS, denies the allegations contained in paragraph 143 of Plaintiff's Verified Amended Complaint.

/s/ DOUGLAS V. SANCHEZ .
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& Zimet, LLP
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically to Philip M. Hines, Esquire, Held & Hines, LLP, 2004 Ralph Avenue, Brooklyn, NY 11234 on this 18th day of January 2019.


ARTHUR C. KOSKI